

EF

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July 12, 2012

VIA ECF

Honorable Joanna Seybert
United States District Court
100 Federal Plaza
P.O. Box 9014
Central Islip, NY 11722

Re: United States v. Dominic Cefalu, 11 Cr. 824 (JS)

Dear Judge Seybert:

I represent the defendant, Dominic Cefalu in the above referenced matter. With the consent of A.U.S.A. Amir Toossi, Pretrial Services Officer Steven Casale in New Jersey and Pretrial Services Officer Donna Mackey in New York, I respectfully submit this letter to request a modification of Mr. Cefalu's bail conditions to permit him to leave his home for a period of three (3) hours this Saturday, July 14, 2012 and next Saturday, July 21, 2012, to take care of household needs such as buying food, dry cleaning, and purchasing home maintenance supplies. The reason for this request is that his wife and son will be out of the country on vacation and he needs some time to take care of the shopping which is usually taken care of by his wife.

In sum, we ask that this Court issue an Order modifying Mr. Cefalu's bail conditions to allow him out of the house for a period of three (3) hours on July 14, 2012 and July 21, 2012.

For the Court's information, four prior bail modification requests by Mr. Cefalu have been granted. The first request was granted by Your Honor on March 9, 2012 to travel between 3 p.m. and 8 p.m. on Sunday, March 11, 2012 to a restaurant so that he could celebrate his 32nd wedding anniversary with his wife and children. The second request was granted by Judge Bianco on April 13, 2012 permitting Mr. Cefalu to attend his son's soccer game on Sunday, April 16th, 2012 between the hours of 9 a.m. and 3 p.m. The third request was granted by Your Honor on April 20, 2012 permitting Mr. Cefalu to attend his son's soccer games throughout the soccer season with prior permission from Pre-Trial Services. The fourth request was granted by Your Honor on May 8, 2012 permitting Mr. Cefalu to attend his daughter's college graduation on May 10, 2012.

To remind the Court, Mr. Cefalu was released on a \$2,000,000 bond with the following bail conditions:

- home detention with electronic monitoring;
- his travel is limited to the Southern and Eastern Districts of New York, the District of New Jersey and to job sites outside these jurisdictions provided approval is granted by Pre-trial Services;
- he is also subject to a curfew based on his work schedule, religious, medical, and legal appointments.

To date, Mr. Cefalu has been in compliance with all of his conditions of release that have been in place since his arraignment.

Thank you for your time and consideration of this request.

Respectfully Submitted,



ANDREW MANCILLA

cc: A.U.S.A. Amir Toossi (via email and ECF)
P.T.S.O. Steven Casale (via email)